

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

David Flowers,	)	C/A No. 2:17-cv-02739-RMG-MGB
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Jeffrey Anderson;	)	
Anderson & Associates, and	)	
Gregg Meyers,	)	
	)	
Defendants.	)	

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DISTRICT COURT  
SOUTH CAROLINA  
CHARLESTON

**MOTION TO REMAND**

NOW COMES the Plaintiff moving the Court for an Order remanding this case to state court.

At the time of the filing of this action and at the time of the removal, Plaintiff was a citizen and resident of the state of South Carolina. Defendant Meyers was also at the time of the filing of this action and at the time of the removal, a citizen and resident of the state of South Carolina (as set forth in his Motion to Remand). Further, in spite of the Anderson Defendants' unsupported assertion, Defendant Meyers is not a sham or fraudulent defendant. He is a necessary party as alleged in the Complaint and complete justice cannot be rendered in this case in his absence.

Plaintiff will represent to the court that he is in the process of moving out of the state of South Carolina (to North Carolina) and will be changing his permanent address in the very near future, so if the court opts to defer ruling on this motion until such time as Plaintiff provides his change of address to this court pursuant to the standing order, it would make sense from a judicial economy standpoint if that move would affect the jurisdiction of this court.

Respectfully Submitted this 12<sup>th</sup> day of November, 2017.

A handwritten signature in black ink, appearing to read 'D. Flowers', written over a horizontal line.

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